

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GARY KOOPMANN, TIMOTHY KIDD and
VICTOR PIRNIK, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff(s),

v.

FIAT CHRYSLER AUTOMOBILES N.V.,
SERGIO MARCHIONNE, RICHARD K.
PALMER, SCOTT KUNSELMAN, MICHAEL
DAHL, STEVE MAZURE and ROBERT E.
LEE

Defendants.

Civ. Action No: 15-cv-07199-JMF

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**DECLARATION OF SARA FUKS IN SUPPORT OF PLAINTIFFS' MOTION TO
EXCLUDE CERTAIN TESTIMONY OF DEFENDANTS' PROPOSED EXPERT JAMES
M. LYONS**

I, Sara Fuks, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am counsel at the Rosen Law Firm, P.A., appointed by the Court as Co-Class Counsel for the Class Representatives Gary Koopmann, Timothy Kidd, and Victor Pirnik, in the above captioned action.
2. I submit this declaration in conjunction with Plaintiffs' Motion Exclude Certain Testimony of Defendants' proposed expert James M. Lyons, and to place before the Court certain documents relevant to Plaintiffs' Motion.
3. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Rebuttal Report

of James M. Lyons, dated September 26, 2018.

4. Attached hereto as Exhibit 2 is a true and correct copy of the errata sheet from the deposition transcript of Michael P. Berry, dated August 15, 2018.
5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the deposition transcript of James M. Lyons, dated October 16, 2018.
6. Attached hereto as Exhibit 4 is a true and correct copy of FCA-PIRNIK-001530757-FCA-PIRNIK-001530761 a document produced by Defendants in this action.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 12th day of December 2018, in New York, NY

/s/ Sara Fuks
Sara Fuks